

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF  
OKLAHOMA**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

JEFFREY LOWE,

LAUREN LOWE,

GREATER WYNNEWOOD EXOTIC ANIMAL  
PARK, LLC, and

TIGER KING, LLC,

*Defendants.*

Case No. 6:20-cv-00423-JFH

**UNITED STATES' UNOPPOSED MOTION TO APPEAR REMOTELY**

The United States hereby moves to appear remotely for the May 12, 2021 show cause hearing scheduled by the Court in this case. Counsel for the United States has conferred with counsel for Defendants and Defendants do not oppose this motion, provided that the United States does not oppose a similar request for Defendants to appear remotely.

On March 22, 2021, the Court granted the United States' Motion to Enforce, ruled that Defendants had violated previous Court orders, and set a hearing for May 12, 2021 for Defendants to show cause why contempt sanctions should not be entered against them. Dkt. No. 78. The Court subsequently ordered that Defendants come into compliance with the Court's orders by April 2, 2021. ECF No. 80. As reflected in the United States' April 12, 2021 notice, Defendants did not meet the April 2, 2021 deadline and they remain out of compliance today. ECF No. 83. The May 12, 2021 hearing will provide Defendants with an opportunity to show cause why they continue to defy court orders and why they should not be subject to contempt sanctions.

The United States respectfully requests leave for counsel to appear remotely at the May 12, 2021 hearing. Due to the ongoing coronavirus pandemic, counsel for the United States are avoiding non-essential travel that could potentially expose them and their families to the virus. The lead counsel on this case are located in Denver, Colorado, and Washington, D.C., and thus would have to travel via commercial airline to attend the hearing. A prior hearing in this case, conducted on January 12, 2021, was successfully conducted over video conference. *See* ECF No. 49. The United States requests that counsel be permitted to attend the show cause hearing via telephone or video conferencing, in accordance with the Court's preference. In the alternative, should the Court find in-person attendance would significantly aid the Court in conducting this hearing, the United States requests leave to send one attorney in-person and have additional counsel participate via video or telephone.

For the foregoing reasons, the United States respectfully requests leave to appear remotely at the May 12, 2021 hearing.

DATED: May 6, 2021

Respectfully Submitted,

JEANE E. WILLIAMS  
Acting Assistant Attorney General  
Environment and Natural Resources Division

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